

THE HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

QUNESHIA RAWLS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

CONVERGENT OUTSOURCING, INC.,

Defendant.

Case No. 2:20-cv-01538-RSM

**JOINT STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

I. STIPULATION

Pursuant to LCR 7, Plaintiff QUNESHIA RAWLS and the opt-in Plaintiffs, by and through their counsel, Frank Freed Subit & Thomas, LLP and Anderson Alexander, PLLC, and Defendant CONVERGENT OUTSOURCING INC., by and through its counsel, Jackson Lewis P.C., hereby stipulate and jointly move this Court for an order extending the deadline for Defendant to file and serve its Response to Plaintiff's Complaint from December 4, 2020, to January 8, 2021, so that the parties can engage in good faith efforts to explore the resolution of this action (the parties have already contacted the Court and obtained an extension of all other case management deadlines by six weeks).

The parties stipulate that good cause exists under LCR 7, Fed. R. Civ. P 16(b)(2), and LCR 16(b) to continue the above-referenced deadlines because the parties have agreed to engage in a near term, good faith exploration of a resolution of this matter that could obviate any further

proceedings. The parties likewise stipulate that the requested extension promotes the policy supporting the voluntary resolution of disputes and preservation of judicial resources, and would facilitate an orderly administration of justice.

This Stipulation is based upon the following, and the parties agree:

1. That this is only the second request for an extension of time.
2. That this request is made in good faith and not for the purpose of delay.
3. That nothing in this Stipulation, nor the fact of entering the same, shall be construed as waiving any claim and/or defense held by any party.

IT IS SO STIPULATED.

DATED this 3rd day of December, 2020.

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II. ORDER

Pursuant to the above stipulation, it is SO ORDERED.

DATED this 4th day of December, 2020.



RICARDO S. MARTINEZ
CHIEF UNITED STATES DISTRICT JUDGE